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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

ALEJANDRA CERDA,)	CIVIL NO. 1:22-cv-00406-BAM
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	FOR EXTENSION OF TIME
vs.)	
)	
KILOLO KIJAKAZI, Acting Commissioner)	
Of Social Security,)	
)	
Defendant.)	
)	

IT IS HEREBY STIPULATED, by and between Alejandra Cerda (“Plaintiff”) and Kilolo Kijakazi, Acting Commissioner of Social Security (“Defendant”) (collectively, the “Parties”), by and through their respective counsel of record that the time for Defendant to respond to Plaintiff’s Opening Brief (ECF No. 12) be extended by 14 days. The current deadline is November 11, 2022, and the new deadline would be November 25, 2022. Plaintiff shall file any reply on or before December 12, 2022. This is the second extension of time requested in the above-captioned matter and the first extension of time requested concerning Defendant’s response to Plaintiff’s Opening Brief. Undersigned defense

counsel respectfully requests this additional time due to overlapping deadlines—she currently has four dispositive motions due within a two-day period.

Date: October 25, 2022

NEWEL LAW

By: /s/ Melissa Newel*

MELISSA NEWEL

(*Authorized by e-mail on October 25, 2022)

Attorneys for Plaintiff

Date: October 25, 2022

PHILLIP A. TALBERT

United States Attorney

By: /s/ Sharon Lahey

SHARON LAHEY

Special Assistant United States Attorney

ORDER

Pursuant to stipulation, good cause appearing, Defendant's request for an extension of time to respond to Plaintiff's Opening Brief is GRANTED. Defendant shall file a response on or before November 25, 2022. Plaintiff's reply, if any, shall be filed on or before December 12, 2022.

IT IS SO ORDERED.

Dated: October 26, 2022

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE